

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NORTH AMERICAN SALT COMPANY))	
)	
Plaintiff)	
)	
v)	NO. 09 cv 05180
)	
L.P.N.D., INC.)	District Judge: Rebecca R. Pallmeyer
)	
Defendant)	Magistrate Judge: Geraldine Soat Brown
_____)	

MOTION FOR ENTRY OF SUMMARY JUDGMENT ORDER

Plaintiff North American Salt Company (“NASC”), by and through its attorney F. John McGinnis, moves this Court for entry of summary judgment order pursuant to Fed. R. Civ. P. 56 against L.P.N.D., Inc. and in support thereof states as follows:

1. On March 9, 2010, North American Salt Company filed its motion for summary judgment against L.P.N.D., Inc., together with its Statement of Undisputed Facts and its Memorandum.
2. On March 11, 2010, this Court entered a briefing schedule on the motion requiring the response to the motion to be filed on or before April 9, 2010.
3. On March 24, 2010 counsel for North American Salt Company received a fax from counsel for L.P.N.D. Inc. stating that L.P.N.D. Inc. would not be filing a response to the motion for summary judgment and that North American Salt Company should prepare an agreed judgment order. A copy of the fax is attached hereto as Exhibit A.

4. On or about March 29, 2010 counsel for North American Salt Company forwarded to counsel for L.P.N.D., Inc. a copy of the Judgment Order attached hereto as Exhibit B. Counsel for L.P.N.D., Inc. stated that he had no objection to the order.

WHEREFORE North American Salt Company prays that this Court enter the Judgment Order attached hereto as Exhibit B on its summary judgment motion against L.P.N.D., Inc.

NORTH AMERICAN SALT COMPANY

By: s/ F. John McGinnis

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CERTIFICATE OF SERVICE

F. John McGinnis, an attorney, certifies that I served this **MOTION FOR ENTRY OF SUMMARY JUDGMENT ORDER** on the below persons at the below addresses by ECF service.

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